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June 5, 2014

**Via FOIA Online Request**

Regional Freedom of Information Officer  
U.S. EPA, Region 5

**Mark R. Beebe**  
Also admitted in Texas  
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*Re: Request for Copy of Prime Contract and related Bond Information  
re: EPA's Contract with SulTRAC  
Jacobsville Neighborhood Soil Contamination Site, OU 2 Project 1, Remedial Action  
EPA ID# INN000508142*

Dear Sir or Madam:

We write on behalf of our client, Lawson Environmental Services, LLC ("LES"), which provided materials and services for the above-referenced project pursuant to a subcontract with the project's prime contractor, SulTRAC. At this time, LES has completed all work and fulfilled all obligations in accordance with the terms of the subcontract. Despite LES' repeated requests for payment, SulTRAC has refused to pay LES for invoiced work, which is a clear violation of the parties' subcontract.

Pursuant to its rights under the **Miller Act (40 U.S.C. § 3133(a))** and the **Freedom of Information Act (5 U.S.C. § 552)**, LES respectfully requests the following information related to the above-reference project:

- (1) Copies of any and all bonds related to SulTRAC's prime contract with the EPA for work performed at the Jacobsville Neighborhood Soil Contamination Site, including certified copies of any payment and/or performance bonds related to that contract.
- (2) Copies of the prime contract between SulTRAC and the EPA for work performed at the Jacobsville Neighborhood Soil Contamination Site.
- (3) Copies of any payment ledgers, invoice registers, or other documents showing all payments made to SulTRAC by the EPA related to SulTRAC's prime contract with the EPA for work performed at the Jacobsville Neighborhood Soil Contamination Site, including documents which show:
  - a) the dates such payments were remitted,
  - b) the amount of each payment, and
  - c) the reasons for each payment.

Given the time-sensitive nature of this request, we ask that you provide us the above-requested information and documents as soon as possible. To that extent, please do not hesitate to separately send documents responsive to one of the aforementioned requests if those documents are more readily available than documents responsive to another request.

Also, pursuant to 40 U.S.C. § 3133(a), we have attached an affidavit from LES President Cecil Lawson which confirms that LES has yet to receive payment for labor and materials it supplied for work described in the contract.

Of course, we will reimburse you for any fees required by law to cover the cost of preparing certified copies of the requested documents. Thank you for your cooperation and assistance in this matter, and please do not hesitate to contact me with any questions.

With highest regards, we remain

Very truly yours,

**ADAMS AND REESE LLP**



Timothy M. Brinks

TMB/lsw

AFFIDAVIT

STATE OF Louisiana

PARISH/COUNTY OF Terrebonne

BEFORE ME the undersigned Notary Public, personally appeared Cecil Lawson, who, being first duly sworn by me, did state that:

1. I, Cecil Lawson, am the President of Lawson Environmental Services, LLC (LES), and I have personal knowledge of the matters set forth in this affidavit.
2. In my capacity as an officer of LES, I was actively involved with the work performed by LES at the Jacobsville Neighborhood Soil Contamination Site (the "Jacobsville Project") in furtherance of the underlying EPA's prime contract with SulTRAC.
3. LES provided materials and services for the Jacobsville Project pursuant to a subcontract executed between LES and SulTRAC (the "Subcontract").
4. LES has completed all of its obligations and duties under the Subcontract, and SulTRAC itself has admitted that all work had been completed by June 28, 2013.
5. LES has timely and properly invoiced SulTRAC for all services and materials which it provided for the Jacobsville Project.
6. Under the terms of the Subcontract, SulTRAC was obligated to provide LES with full and final payment of these invoices.
7. LES has yet to receive full payment for the labor, materials, and services which it provided to SulTRAC for the Jacobsville Project.

Cecil Lawson

Cecil Lawson, President  
Lawson Environmental Services, LLC

Sworn to and subscribed before me  
this 28th day of February, 2014.

Richard Louis Haik  
NOTARY PUBLIC #92071  
Richard Louis Haik

